



CONNOLLY BOVE LODGE & HUTZ LLP

ATTORNEYS AT LAW

Collins J. Seitz, Jr.

TEL (302) 888-6278

FAX (302) 255-4278

EMAIL cseitz@cblh.com

REPLY TO Wilmington Office

The Nemours Building
1007 North Orange Street
P.O. Box 2207
Wilmington DE 19899
TEL (302) 658 9141
FAX (302) 658 5614

1990 M Street, NW, Suite 800
Washington DC 20036
TEL (202) 331 7111
FAX (202) 293 6229

Wells Fargo Center
South Tower, Suite 3150
355 South Grand Avenue
Los Angeles CA 90071
TEL (213) 787 2500
FAX (213) 687 0498

WEB www.cblh.com

August 1, 2006

By Electronic Filing and Hand Delivery

Honorable Gregory M. Sleet
United States District Court
J. Caleb Boggs Federal Building
844 N. King Street - Room 4324
Wilmington, Delaware 19801

Re: *Integrated Health Services of Cliff Manor v. THCI Company, LLC*
Civil Action No. 04-910 (GMS)

Dear Judge Sleet:

This firm represents THCI Company LLC ("THCI"). I write in response to the letter from plaintiffs' counsel, Michael Lastowski, dated July 28, 2006 (Docket No. 187). THCI will not burden the Court by arguing the merits of this matter in correspondence. However, inasmuch as plaintiffs now have consented to vacate the Facilities as requested by THCI in its pending Motion for Partial Summary Judgment and Permanent Injunction (Docket Nos. 149-151), THCI encloses a proposed form of order reflecting plaintiffs' proposal and requiring them to vacate the nine nursing home facilities at issue on August 31, 2006.

Thank you for Your Honor's consideration.

Respectfully,

Collins J. Seitz, Jr.
(Bar No. 2237)

CJS,Jr./saj
Enclosure

cc: Michael R. Lastowski, Esquire (w/enc.) (by electronic service)
Daniel J. DeFranceschi, Esquire (w/enc.) (by electronic service)
Aurora Cassirer, Esquire (w/enc.) (by electronic service)
David S. Sager, Esquire (w/enc.) (by electronic mail)
(479322)